

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO.</b>
<b>v.</b>	<b>:</b>	<b>DATE FILED</b>
<b>PETER RYAN DORNEY,</b>	<b>:</b>	<b>VIOLATION:</b>
<b>a/k/a “Jeffrey Goldberg Hostler”</b>	<b>:</b>	<b>18 U.S.C. § 1343 (wire fraud – 2 counts)</b>
	<b>:</b>	<b>Notice of Forfeiture</b>

**INFORMATION**

**COUNT ONE AND TWO**

**THE UNITED STATES ATTORNEY CHARGES THAT:**

At all times relevant to this Information:

1. Airbnb, Inc. (“Airbnb”) was a corporation with its headquarters in San Francisco, California, engaged in the business of electronic commerce. Airbnb hosted an online marketplace and served as a broker to facilitate rental transactions between property owners and renters looking to book vacation property and short-term residency rentals. Airbnb did not own any of the real estate listings, and instead acted as a broker for the rental transactions, for which it received a commission.

2. Persons wishing to rent a property via Airbnb were required to establish an account with Airbnb, using their means of identification and an email address. Rentals booked through Airbnb could be paid for using a credit card, debit card, or other payment methods approved by Airbnb.

3. Between on or about October 20, 2017, and on or about November 18, 2017, defendant PETER RYAN DORNEY was employed on a temporary basis by a company

(hereinafter the “Company”) located in Silver Spring, Maryland, and was provided a specific email address by the Company to be used for work-related purposes only.

**THE SCHEME**

4. Beginning on or about October 23, 2017, and continuing until on or about November 2, 2017, within the Eastern District of Pennsylvania, the District of Maryland, and elsewhere, defendant

**PETER RYAN DORNEY,  
a/k/a “Jeffrey Goldberg Hostler,”**

devised and intended to devise a scheme to defraud and to obtain money and property by means of false and fraudulent pretenses, representations, and promises.

**MANNER AND MEANS**

5. On or about October 23, 2017, defendant PETER RYAN DORNEY, using the alias “Jeffrey Goldberg Hostler,” placed a telephone call to real estate agent J.M., who was located in Philadelphia, Pennsylvania, to inquire about buying a property in Philadelphia, Pennsylvania valued at between approximately \$1,900,000 and approximately \$2,500,000, and identified specific condominium buildings he was interested in, when in reality, defendant DORNEY could not afford such a home and had no intention of purchasing such home.

6. On or about October 23, 2017, defendant PETER RYAN DORNEY, posing as “Jeffrey Goldberg Hostler,” sent an email to real estate agent J.M., who was located in Philadelphia, Pennsylvania, in which he reiterated his interest in purchasing a property valued at between approximately \$1,900,000 and approximately \$2,500,000, and expressed his interest in a unit in a specific condominium building.

7. On or about October 26, 2017, defendant PETER RYAN DORNEY, posing as “Jeffrey Goldberg Hostler,” sent an email to real estate agent J.M., who was located in

Philadelphia, Pennsylvania, in which he identified approximately nine specific properties located in Philadelphia that he claimed to be interested in purchasing.

8. On or about October 28, 2017, defendant PETER RYAN DORNEY, posing as “Jeffrey Goldberg Hostler,” met real estate agent J.M. at a restaurant in Philadelphia, Pennsylvania, ostensibly for the purpose of discussing defendant DORNEY’s purported interest in purchasing a multi-million-dollar condominium in Philadelphia.

9. On or about October 28, 2017, at a restaurant in Philadelphia, Pennsylvania, defendant PETER RYAN DORNEY, posing as “Jeffrey Goldberg Hostler,” took a photograph of real estate agent J.M.’s driver’s license, and acquired the full account number and expiration date of J.M.’s MasterCard credit card ending in 5035 (hereinafter “J.M.’s MasterCard”), which J.M. used to pay for the meal, all without J.M.’s knowledge and consent.

10. On or about October 31, 2017, defendant PETER RYAN DORNEY, posing as “Jeffrey Goldberg Hostler,” executed an “exclusive buyer agency contract” appointing real estate agent J.M.’s firm as defendant DORNEY’s exclusive real estate agent to represent defendant DORNEY in connection with his feigned interest in purchasing a multi-million-dollar condominium in Philadelphia, Pennsylvania.

11. On or about November 2, 2017, defendant PETER RYAN DORNEY created an Airbnb account in his own name, and listed J.M.’s MasterCard as his method of payment, all without J.M.’s knowledge and consent.

12. On or about November 2, 2017, in Silver Spring, Maryland, defendant PETER RYAN DORNEY sent an email from his personal email account to the email account he was provided by the Company, to which defendant DORNEY attached a photograph of the driver’s license of real estate agent J.M.

13. On or about November 2, 2017, from the offices of the Company located in Silver Spring, Maryland, defendant PETER RYAN DORNEY booked via the internet an Airbnb rental costing approximately \$1,242, using his newly-created Airbnb account, and charged the rental to J.M.'s MasterCard, all without J.M.'s knowledge and consent.

**WIRE FRAUD**

14. On or about each of the following dates, in the Eastern District of Pennsylvania, the District of Maryland, and elsewhere, defendant

**PETER RYAN DORNEY,  
a/k/a "Jeffrey Goldberg Hostler,"**

for the purpose of executing the scheme described above, and attempting to do so, caused to be transmitted by means of wire communication in interstate commerce the signals and sounds described below, each transmission constituting a separate count:

COUNT	DATE	METHOD OF WIRE AND DESCRIPTION
ONE	October 26, 2017	Email sent by defendant PETER RYAN DORNEY, posing as "Jeffrey Goldberg Hostler," from Silver Spring, Maryland to real estate agent J.M in Philadelphia, Pennsylvania, in which he identified approximately nine specific properties located in Philadelphia that he claimed to be interested in purchasing.
TWO	November 2, 2017	Airbnb booking made by defendant PETER RYAN DORNEY via the internet from Silver Spring, Maryland, to San Francisco, California, using J.M.'s MasterCard.

All in violation of Title 18, United States Code, Section 1343.

**NOTICE OF FORFEITURE**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. As a result of the violations of Title 18, United States Code, Sections 1343 set forth in this Information, defendant

**PETER RYAN DORNEY,  
a/k/a “Jeffrey Goldberg Hostler,”**

shall forfeit to the United States of America any property constituting, or derived from, proceeds traceable to the commission of such offense, including but not limited to \$1,242 in United States currency (money judgment).

2. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred to, sold to, or deposited with a third party;
- c. has been placed beyond the jurisdiction of this Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 28, United States Code, Section 2461(c) incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Section 981(a)(1)(C), and 28 U.S.C.

Section 2461.

A handwritten signature in dark ink, appearing to read "Ronald Sarach for". The signature is fluid and cursive, with the word "for" written in a smaller, simpler script at the end.

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**WILLIAM M. McSWAIN**  
**UNITED STATES ATTORNEY**

No. \_\_\_\_\_

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**UNITED STATES DISTRICT COURT**

Eastern District of Pennsylvania

Criminal Division

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**THE UNITED STATES OF AMERICA**

vs.

**PETER RYAN DORNEY**

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**INFORMATION**

**Counts**

18 U.S.C. § 1343 (wire fraud – 2 counts); Notice of Forfeiture

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A true bill.

\_\_\_\_\_  
Foreman

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Filed in open court this \_\_\_\_\_ day,  
Of \_\_\_\_\_ A.D. 20 \_\_\_\_\_

\_\_\_\_\_  
Clerk

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Bail, \$ \_\_\_\_\_

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